

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

No. 23-cv-10684-IT

Plaintiff / Counterclaim-Defendant,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant / Counterclaim-Plaintiff.

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**PLAINTIFF'S RESPONSES TO DEFENDANT'S  
FIRST SET OF INTERROGATORIES**

Plaintiff Servicios Funerarios GG, S.A. DE C.V. ("Servicios Funerarios") responds, pursuant to Federal Rule of Civil Procedure 33 and Local Rule 33.1 of the First Set of Interrogatories (the "Interrogatories") propounded by Defendant Advent International Corporation ("Advent"), as follows:

**General Objections and Reservations**

1. Servicios Funerarios objects to the Interrogatories to the extent that they purport to impose obligations beyond those set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court.

2. Servicios Funerarios objects to the Interrogatories to the extent that they call for information that constitutes privileged attorney-client communications or that is otherwise protected from disclosure under the applicable privileges, laws, or rules.

3. Servicios Funerarios objects to the Interrogatories to the extent that they are overbroad, vague, not stated with reasonable particularity, and/or call for information that is not relevant to any party's claim or defense or is not proportional to the needs of the

case.

4. Servicios Funerarios objects to the Interrogatories to the extent that they are unduly burdensome, time-consuming, and extremely costly and, in that event, requests that Advent bear the cost of responding.

5. Servicios Funerarios objects to the Definitions of the Interrogatories to the extent they increase the burden of responding. For example, the definitions of “Servicios Funerarios” and “Gayosso” render the Interrogatories as overbroad.

6. Servicios Funerarios objects to the use of the term “Targeted Employees” because it is inaccurate, does not reflect the facts of this case, and is unduly prejudicial.

7. Servicios Funerarios responds based upon information reasonable available to it and expressly reserves the right to supplement these Responses, including by reason of continuing investigation and discovery.

### **Responses to Interrogatories<sup>1</sup>**

#### **INTERROGATORY NO. 1**

Describe in detail, with reference to supporting documents, the complete factual and legal basis for identifying each of the Targeted Employees and for declining to identify Carlos Peña in the Criminal Complaint.

#### **RESPONSE:**

As noted above, objection to the term “Targeted Employees,” including because it mischaracterizes the nature of the criminal proceedings in Mexico.

The factual basis for identifying Enrique Pani Bano and Carlos Alfredo Paz Perez in the June 2, 2022 Criminal Complaint was their execution of the SPA on behalf of

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<sup>1</sup> Each General Objection or Reservation shall be deemed incorporated into the response and objections to each specific Interrogatory.

Gayosso. The factual basis for identifying Enrique Pani Bano, Carlos Alfredo Paz Perez, Carlos Lukac Ostreche, James Westra, and Alejandro Sosa Hernandez in the October 5, 2022 supplemental statement includes that, as employees or agents of Advent or of its related or affiliated entities, they were involved in the sale, the operation, or financial reporting of Gayosso, and their possible direct or indirect participation in the wrongful conduct set forth in the criminal complaint should be investigated by the Public Prosecutor's Office. More specifically:

- Enrique Pani Bano was an Advent Managing Director and the Chairman of Gayosso's Board, in addition to executing the SPA as a representative of Gayosso. He was also a lead negotiator on the sale of Gayosso's shares and was believed to have knowledge of Gayosso's operations, business practices, and financial reporting.
- Alfredo Paz Perez was a Senior Director and co-head of the Portfolio Support Group, Latin America, for Advent International PE Advisors S.C. He was an active Board Member of Gayosso since 2014 and a member of the Finance and Auditing Committees. In addition to executing the SPA as a representative of Gayosso, he was a lead negotiator on the sale of Gayosso's shares and was believed to have knowledge of Gayosso's operations, business, practices, and financial reporting.
- Carlos Lukac Ostreche was CEO of Gayosso from October 2011 to January 2021. He was a member of the Executive Committee of Gayosso. He had knowledge of Gayosso's operations, business, practices, and financial reporting.

- Alejandro Sosa Hernandez was Director of Operations of Gayosso from January 2015 to June 2021. He was a member of the Executive Committee of Gayosso. He had knowledge of Gayosso's operations, business, practices, and financial reporting.
- James Westra was a Managing Partner of AIC and the General Counsel of AIC. He was a lead negotiator on the sale of Gayosso's shares, including with respect to the false representations made in the SPA.

Additional factual basis is the information contained in documents being produced and this response will be supplemented to provide the Bates numbers for such documents once production is made.

The Criminal Complaint did not purport to state a legal basis for identifying the employees since, under the Mexican criminal justice system, it is not the role of a complainant such as Servicios Funerarios to determine whether a person or entity should be charged with a crime or be arrested. Rather, it is the role of the Public Prosecutor's Office to conduct the appropriate investigation of the matters asserted in a criminal complaint to determine whether crimes were committed and, if so, to then take what in the prosecutor's discretion are the appropriate steps, including bringing the matter before the criminal courts and seeking arrest warrants. Here, upon conducting an independent investigation of the fraud perpetrated by AIC, the Public Prosecutor's Office made the independent decision to proceed against the employees pursuant to Article 21 of the Mexican Constitution. A criminal court judge, upon review of the conclusions of the investigation performed by the Public Prosecutor, issued the arrest warrants for the employees.

Servicios Funerarios did not identify Carlos Peña in the Criminal Complaint because it did not believe that he participated in the wrongful conduct set forth in the Criminal Complaint.

**INTERROGATORY NO. 2**

State whether You contend, as to each of the Targeted Employees, that the issuance of the Arrest Warrants complied with the requirements of Mexican law, and describe in detail, with reference to supporting documents, the complete factual and legal basis for Your contention.

**RESPONSE:**

As noted above, objection to the term “Targeted Employees,” including because it mischaracterizes the nature of the criminal proceedings in Mexico.

Yes, as to each of the employees.

Our contention is based on the proceedings and conclusions of the Public Prosecutor and the Mexican courts, and on related documents which, to the extent they are in the possession, custody, or control of Servicios Funerarios will be produced pursuant to Advent’s document requests and, upon production, this response will be supplemented to identify the relevant documents by Bates numbers.

In accordance with Articles 141 and 142 of the National Code of Criminal Procedures, after conducting an independent investigation the Public Prosecutor can exercise discretion to request, in a private hearing, that a Judge issue an arrest warrant. Based upon available information, on October 7, 2022, the Public Prosecutor, after conducting an independent investigation, requested such a hearing before a Judge, and, at that hearing, he presented the basis of the criminal fraud case against the employees. Based upon available information, the understanding is that the Judge determined that the Public Prosecutor had met the

requirements under Mexican law by providing evidence sufficient to prove the fraud committed by the employees (and AIC) against Servicios Funerarios and issued the arrest warrants against the employees.

Neither Servicios Funerarios nor its counsel attended or participated in the hearing before the Control Judge.

**INTERROGATORY NO. 3**

Describe in detail, with reference to supporting documents, the circumstances surrounding the formation of Servicios Funerarios, including without limitation the purpose behind forming Servicios Funerarios; the persons responsible for its formation; and any involvement, input, or participation in any aspect of its formation by Carlos Peña, Octavio Trejo, or the El-Mann Family.

**RESPONSE:**

Servicios Funerarios was formed as a corporation pursuant to Mexican law on January 22, 2020. The purpose behind the incorporation of Servicios Funerarios was for its purchase of the shares in Gayosso. The person responsible for the decision to incorporate Servicios Funerarios was Pablo Peña Vazquez. There was no involvement, input, or participation by Carlos Peña, Octavio Trejo, or the El-Mann Family in any aspect of the incorporation of Servicios Funerarios.

**INTERROGATORY NO. 4**

Describe in detail, with reference to supporting documents, Servicios Funerarios' ownership structure, and to the extent it has changed over time, any prior ownership structure, including without limitation its current or former ultimate beneficial owner(s); any agreements or understandings concerning profit sharing, stock options, phantom interests, deferred compensation, or any other economic entitlements or benefits of any

kind; any current or former relationship with Banco Ve Por Más, SA Institución de Banca Múltiple, Grupo Financiero Ve Por Más, and the Trust Fideicomiso 666; and any other equity, ownership, or economic interests in Servicios Funerarios of any kind.

**RESPONSE:**

Servicios Funerarios' shares have at all times been owned by a trust established pursuant to Contrato de Fideicomiso de Administracion Number 682 and by Pablo Peña.

**INTERROGATORY NO. 5**

Identify the names, addresses, and employment titles of each person with knowledge of the Gayosso Transaction and describe in detail what knowledge You believe each identified person to have.

**RESPONSE:**

The following individuals have knowledge responsive to this interrogatory:

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
<b>Advent International</b>			
Patrice Etlin	Av. Brig. Faria Lima 3311, 9º andar, 04538-133 São Paulo, SP, Brazil	Managing Partner	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions



Names	Addresses	Employment titles	Basis of Knowledge
			where the performance of the company was discussed
Juan Pablo Zucchini	Av. Brig. Faria Lima 3311, 9º andar, 04538-133 São Paulo, SP, Brazil	Managing Partner	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Mario Malta	Av. Brig. Faria Lima 3311, 9º andar, 04538-133 São Paulo, SP, Brazil	Managing Director	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			in the portfolio review sessions where the performance of the company was discussed
Brenno Raiko	Av. Brig. Faria Lima 3311, 9º andar, 04538-133 São Paulo, SP, Brazil	Managing Director	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Wilson Rosa	Av. Brig. Faria Lima 3311, 9º andar, 04538-133 São Paulo, SP, Brazil	Managing Director	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Manuel Garcia Podesta	Avenida Calle 82 #10-33, Oficina 702, Bogotá 110221, Colombia	Managing Director	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Mauricio Salgar	Avenida Calle 82 #10-33, Oficina 702, Bogotá 110221, Colombia	Managing Director	Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where

Names	Addresses	Employment titles	Basis of Knowledge
			the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Enrique Pani	NA	Former Managing Director	Chairman of the Board of Directors of Gayosso at the time of closing. Partner in charge within Advent of Gayosso. Led the sale of Gayosso to Servicios Funerarios Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			company was discussed
Carlos Alfredo Paz	Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico	Senior Director and Co-Head of Portfolio Support Latam	Board member of Gayosso since 2014 until closing. Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed
Ariel Blumenkranc	Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico	Managing Director	After Pani left Advent (August 2021), Mr. Blumenkranc took over leading Advent's Mexico office. Mr. Blumenkranc has knowledge about the sale of Gayosso to Servicios

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			Funerarios and the sale to other bidders in the past
Carlos Peña	NA	Former Director	Participated in the sale of Gayosso to Servicios Funerarios. Assisted to the Board of Directors of Gayosso since May 2019
Veronica Stenner	NA	Former Associate	Participated in the investment committees where the transaction was presented and discussed several times. Participated in the portfolio review sessions where the performance of the company was discussed. Participated in the sale of Gayosso to Servicios Funerarios.
David Mussafer	Prudential Tower 800 Boylston Street, Boston, MA 02199-8069, USA	Managing Partner	Participated in the approval of the sale of Gayosso as part of the Investment Committee. Participated in the investment committees where the transaction was presented and

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			discussed several times
John Maldonado	Prudential Tower 800 Boylston Street, Boston, MA 02199-8069, USA	Managing Partner	Participated in the approval of the sale of Gayosso as part of the Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times
Chris Egan	Prudential Tower 800 Boylston Street, Boston, MA 02199-8069, USA	Managing Partner	Participated in the approval of the sale of Gayosso as part of the Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times
James Westra	Prudential Tower 800 Boylston Street, Boston, MA 02199-8069, USA	Managing Partner and Chief Legal Officer	Approved the sale of Gayosso. Negotiated and approved the Reps and Guarantees of the SPA. Negotiated and signed the Seller's Guarantee
Richard Kane	Prudential Tower 800 Boylston Street, Boston, MA 02199-8069, USA	Managing Director and COO	Approved the sale of Gayosso

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
Eileen Sivoella	Prudential Tower 800 Boylston Street, Boston, MA 02199- 8069, USA	Managing Director and CFO	Approved the sale of Gayosso
Heather Zuzenak	Prudential Tower 800 Boylston Street, Boston, MA 02199- 8069, USA	Chief Compliance Officer	Approved the sale of Gayosso
<b>Grupo Gayosso</b>			
Carlos Lukac	NA	Former CEO	Participated in the management presentations with Servicios Funerarios. Led the sale process internally. Participated in some meetings with Pablo Peña
Octavio Trejo	NA	Former CFO	Participated in the management presentations with Servicios Funerarios. Participated in the data room and SPA. Participated in some meetings with Pablo Peña
Ruben Saucedo	NA	Former Legal Director	Participated in the data room and SPA
Everardo Garcia	NA	Former Sales Director	Participated in the management presentations with Servicios Funerarios



<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
Alejandro Sosa	NA	Former Operations Director	Participated in the management presentations with Servicios Funerarios
Oscar Chavez	NA	Former Marketing and Planning Director	Participated in the management presentations with Servicios Funerarios
Alejandro Kourchenko	NA	Former IT Director	Participated in the management presentations with Servicios Funerarios
Luis Arturo Flores	NA	Former HHRR Director	Participated in the management presentations with Servicios Funerarios
Ricardo Lemus	James Sullivan 71, San Rafael, Cuauhtemoc, 06470, Mexico City, Mexico	Funeral Homes Director	Participated in the management presentations with Servicios Funerarios
Fabiola Garcia	NA	Former Finance Planning Director	Participated in the data room
<b>Citigroup</b>			
Lorenzo Massart	NA	Managing Director	Advised Advent on the sale of Gayosso
<b>Mijares, Angoitia, Cortes y Fuentes</b>			
Patricio Trad	Javier Barros Sierra 540, 4to piso, Park Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México.	Partner	Advised Advent in the sale of Gayosso during the SPA process
Juan Pablo Betancourt	Javier Barros Sierra 540, 4to piso, Park	Associate	Advised Advent in the sale of Gayosso

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
	Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México.		during the SPA process
Pedro García Ampudia	Javier Barros Sierra 540, 4to piso, Park Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México.		Advised Advent in the sale of Gayosso during the SPA process
Fernando Molina Ostos	Javier Barros Sierra 540, 4to piso, Park Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México.		Advised Advent in the sale of Gayosso during the SPA process
Mauricio Guals Pons	Javier Barros Sierra 540, 4to piso, Park Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México.		Advised Advent in the sale of Gayosso during the SPA process
<b>Llaguno, Name y Moreno</b>			
Francisco Moreno Bazán	Bosque de Duraznos 67-101 B Bosques de las Lomas 11700 Ciudad de México	Partner	Advised Advent and Gayosso during the SPA process and M&A process as Gayosso's corporate external legal counsel
Leticia Espinosa	Bosque de Duraznos 67-101 B Bosques de las Lomas	Associate	Advised Advent and Gayosso during the SPA process and M&A process as

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
	11700 Ciudad de México		Gayosso's corporate external legal counsel
<b>Mexcap Partners</b>			
Pablo Peña	Antonio Dovali Jaime 70, Torre B, Piso 10, Zedec Santa Fe Alvaro Obregón, 01210, Mexico City, Mexico	Managing Partner  Former Partner of Execution Finance (ExeFin)	Advised Servicios Funerarios in the acquisition of Gayosso and the financing for the acquisition
Mariana González	Antonio Dovali Jaime 70, Torre B, Piso 10, Zedec Santa Fe Alvaro Obregón, 01210, Mexico City, Mexico	Managing Director  Former Executive Director of Execution Finance (ExeFin)	Advised Servicios Funerarios in the acquisition of Gayosso and Sale and the financing for the acquisition
Miguel Rizo Patrón	Antonio Dovali Jaime 70, Torre B, Piso 10, Zedec Santa Fe Alvaro Obregón, 01210, Mexico City, Mexico	Managing Director  Former Director of Execution Finance (ExeFin)	Advised Servicios Funerarios in the acquisition of Gayosso and the financing for the acquisition
<b>HSBC (Main Lender and structuring agent)</b>			
Mónica Macia	452 Fifth Avenue New York, NY 10018, USA	Managing Director- Loan Syndications	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Guillermo Andrade	452 Fifth Avenue New York, NY 10018, USA	Vice President- Loan Syndications	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
Marula Solsa	452 Fifth Avenue New York, NY 10018, USA	Analyst- Loan Syndications	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Juan Carlos Pérez Carmona	Av. Paseo de la Reforma 347 México D.F. 06500	Director- Commercial Banking Origination	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Citlali Guzman	Av. Paseo de la Reforma 347 México D.F. 06500	Vice President Commercial Banking Origination	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Estefania Michel	Av. Paseo de la Reforma 347 México D.F. 06500	Analyst- Commercial Banking Origination	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Victor Coalla	Av. Paseo de la Reforma 347 México D.F. 06500	Head Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Antonio Sañudo	Av. Paseo de la Reforma 347 México D.F. 06500	Director Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
David Durán	Av. Paseo de la Reforma 347 México D.F. 06500	Relationship Manager Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Ali Lam	Av. Paseo de la Reforma 347 México D.F. 06500	Relationship Manger Support Corporate Banking	Advised Gayosso/HSBC for the syndicated loan

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			to substitute the CPPIB's financing
<b>Creel, García-Cuéllar, Aiza y Enríquez</b>			
Pedro Velasco	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Partner	Lenders' Legal Counsel for the syndicated loan
Emilio Aarún	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Partner	Lenders' Legal Counsel for the syndicated loan
Victor Gallegos	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Counsel	Lenders' Legal Counsel for the syndicated loan
Martín Pavón	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Associate	Lenders' Legal Counsel for the syndicated loan
Javier Lavalle	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Associate	Lenders' Legal Counsel for the syndicated loan
<b>Finance Law Advisory Group</b>			
Boris Otto	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección,	Partner	Gayosso's Legal Counsel for the syndicated loan

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
	Miguel Hidalgo, 11000 Ciudad de México, CDMX		
Adrian Cabrero	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Partner	Gayosso's Legal Counsel for the syndicated loan
Salvador Padilla	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Associate	Gayosso's Legal Counsel for the syndicated loan
Mariana Montaña	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Associate	Gayosso's Legal Counsel for the syndicated loan
<b>Ritch Mueller</b>			
Alejandra Eheverría González	Av. Pedregal No. 24 Piso 10, Molino del Rey, 11040, CDMX	Legal Counsel	Advised Advent, Gayosso and CPPIB for the release of guarantees granted under the CPPIB financing
<b>Sarur Servicios Integrales</b>			
Raúl Sánchez	Paseo de la Reforma 2345-101, Col. Lomas de Reforma, Miguel Hidalgo, CP. 11930, CDMX	Partner	Advised Servicios Funerarios in Gayosso's acquisition and sale and leaseback with Fibra UNO

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
Miranda Bandala	Paseo de la Reforma 2345-101, Col. Lomas de Reforma, Miguel Hidalgo, CP. 11930, CDMX	Counsel	Advised Servicios Funerarios in Gayosso's acquisition and sale and leaseback with Fibra UNO
Ivan Apatenco	Paseo de la Reforma 2345-101, Col. Lomas de Reforma, Miguel Hidalgo, CP. 11930, CDMX	Counsel	Advised Servicios Funerarios in Gayosso's acquisition and sale and leaseback with Fibra UNO
Jimena Rodriguez	Paseo de la Reforma 2345-101, Col. Lomas de Reforma, Miguel Hidalgo, CP. 11930, CDMX	Counsel	Advised Servicios Funerarios in Gayosso's acquisition and sale and leaseback with Fibra UNO
<b>Pontones &amp; Ledesma</b>			
Arturo Ledesma Ruiz	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX	Partner	Advised Servicios Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's syndicated loan
Irving Mallen	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX		Advised Servicios Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			and leaseback transaction and guarantees of Gayosso's syndicated loan
<b>Mancera- E&amp;Y</b>			
Rafael Aguirre	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco , CDMX 11520, México,	Former Partner-Transaction Services	Advised Servicios Funerarios for Gayosso's financial due diligence for the acquisition, coordinated the labor and tax due diligence for the acquisition
José Luis Acosta	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Transaction Services	Advised Servicios Funerarios for Gayosso's financial due diligence for the acquisition, coordinated the labor and tax due diligence for the acquisition
Liliana Chong	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Transaction Services	Advised Servicios Funerarios for Gayosso's financial due diligence for the acquisition, coordinated the labor and tax due diligence for the acquisition
Fernando Escamilla	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara	Partner- Transaction Tax	Advised Servicios Funerarios on the tax structure for Gayosso's acquisition



<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
	Polanco, CDMX 11520, México,		
Miguel Ibañez	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Manager- Transaction Tax	Advised Servicios Funerarios on the tax structure for Gayosso's acquisition
Iván Pardo	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Former Manager- Transaction Tax	Advised Servicios Funerarios on the tax structure for Gayosso's acquisition
Mario Arregoytia	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Partner Audit	Reviewed the transaction for auditing purposes
<b>Notaria 24 CDMX</b>			
Marisol Sabater	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan and Gayosso's Sale and Leaseback
Armando Gómez	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan and Gayosso's Sale and Leaseback
Edgar Huerta	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			and Gayosso's Sale and Leaseback
Miguel Anaya	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan and Gayosso's Sale and Leaseback
<b>Fibra UNO</b>			
Andre Elmann Arazi	Antonio Dovali Jaime 70 Samara Torre B Piso 11 CDMX	DG Fibra UNO	Analyzed and advised Fibra UNO for Gayosso's sale and leaseback transaction
Gonzalo Robina	Antonio Dovali Jaime 70 Samara Torre B Piso 11 CDMX	DGA Fibra UNO	Analyzed and advised Fibra UNO for Gayosso's sale and leaseback transaction
Pablo Gómez	Antonio Dovali Jaime 70 Samara Torre B Piso 11 CDMX	Head of Financial Planning – FIBRA UNO	Analyzed and advised Fibra UNO for Gayosso's sale and leaseback transaction
Patricio Hernández	Antonio Dovali Jaime 70 Samara Torre B Piso 11 CDMX	M&A- FIBRA UNO	Analyzed and advised Fibra UNO for Gayosso's sale and leaseback transaction
Alejandro Chico	Antonio Dovali Jaime 70 Samara Torre B Piso 11 CDMX	Legal VP Fibra UNO	Analyzed and advised Fibra UNO for Gayosso's sale and leaseback transaction
<b>CPPIB</b>			
David Colla	Managing Director	Madison Avenue 510, floor 15th, NY, 10022, NY	Analyzed potential financing of the transaction. Lender

<b>Names</b>	<b>Addresses</b>	<b>Employment titles</b>	<b>Basis of Knowledge</b>
			of Gayosso at closing
Nils Schulze-Halberg	Senior Principal	Madison Avenue 510, floor 15th, NY, 10022, NY	Analyzed potential financing of the transaction. Lender of Gayosso at closing
Alberto Garrido		Madison Avenue 510, floor 15th, NY, 10022, NY	Analyzed potential financing of the transaction. Lender of Gayosso at closing
Anthony Hernandez		Madison Avenue 510, floor 15th, NY, 10022, NY	Analyzed potential financing of the transaction. Lender of Gayosso at closing
Shirley Shen		Madison Avenue 510, floor 15th, NY, 10022, NY	Analyzed potential financing of the transaction. Lender of Gayosso at closing

Servicios Funerarios reserves the right to amend this list as discovery progresses.

#### **INTERROGATORY NO. 6**

Describe in detail, and with reference to supporting documents, all engagements, arrangements, or other interactions between Servicios Funerarios' and any auditor, accountant, or entity that provides auditing or accounting services, including without limitation any changes in Servicios Funerarios' engagement with any auditor, accountant, or entity that provides auditing or accounting services; the reasons for the change in auditor, accountant, or entity that provides auditing or accounting services; and any changes in Servicios Funerarios' auditing or accounting practices that Servicios Funerarios' has made

and the reasons for making each change, including without limitation any changes to Servicios Funerarios' revenue recognition and cost recognition practices. For the avoidance of doubt, this Interrogatory includes all engagements, arrangements, or other interactions between Gayosso and any auditor, accountant, or entity that provides auditing or accounting services subsequent to the January 2021 closing of the Gayosso Transaction.

**RESPONSE:**

Servicios Funerarios has no arrangements or supporting documents with any auditor, accountant, or entity that provides auditing or accounting services. Execution Finance entered into an agreement with EY on or about August 1, 2019, to perform financial due diligence of Gayosso (a copy which agreement will be produced):

Date	Provider	Service
January 10, 2019	EY	Financial, tax and social security due diligence for the acquisition of Grupo Gayosso.

Gayosso has had the following engagements for the provision of accounting or auditing services (a copy of each such agreement will be produced):

Date	Provider	Service
January 25, 2017	EY	Technical Memorandum for the implementation of IFRS and its impact on the financial statements for 2016 and 2015
July 24, 2017	EY	Auditing of Grupo Gayosso for 2017, 2016 and 2015 Auditing from some subsidiaries of Grupo Gayosso for 2017, 2016 and 2015 Elaboration of quarterly Cash Flow Statements in relation with the financing from CPPIB
August 8, 2017	EY	Auditing of the contributions to the Social Security system for 2017

Date	Provider	Service
September 11, 2018	EY	Auditing of Grupo Gayosso for 2018 Auditing from some subsidiaries of Grupo Gayosso for 2018 Elaboration of quarterly Cash Flow Statements in relation with the financing from CPPIB
March 27, 2019	EY	Implementation of the IFRS 16 related to leases Definition of new policy IFRS 9 regarding future losses
June 3, 2019	EY	Auditing of Grupo Gayosso for 2019 Auditing from some subsidiaries of Grupo Gayosso for 2019 Elaboration of quarterly Cash Flow Statements in relation with the financing from CPPIB
June 18, 2020	EY	Review all documentation for the sale of the shares of Gayosso and the S&LB, including their impacts in the financial statements
July 22, 2020	EY	Auditing of Grupo Gayosso for 2020 Auditing from some subsidiaries of Grupo Gayosso for 2020 Elaboration of quarterly Cash Flow Statements in relation with the financing from CPPIB
July, 2021	Deloitte	Advisory to analyze the costs associated with the revenues recognized under IFRS
October 15, 2021	EY	Auditing of Grupo Gayosso for 2021 Auditing from some subsidiaries of Grupo Gayosso for 2021 Elaboration of quarterly Cash Flow Statements in relation with the Syndicated loan
October 2021	EY	Auditing of the contributions to the social security system for 2021
October 2021	EY	Auditing of transfer pricing for 2021
December 2021	EY	Defense of the SAT claim of 2016 taxes
February 2, 2022	EY	PRODECON controversy for the merger of Jardines del Tiempo with its parent company Grupo Gayosso
November 18, 2022	PWC	Analysis of revenue recognition under IFRS
November 23, 2022	Deloitte	Auditing of Grupo Gayosso for 2021 and 2022 Auditing from some subsidiaries of Grupo Gayosso for 2021 and 2022

Date	Provider	Service
		Elaboration of quarterly Cash Flow Statements in relation with the Syndicated loan
March 24, 2023	Deloitte	Defense of the SAT claim of 2016 taxes

**INTERROGATORY NO. 7**

Identify the names, addresses, employment titles, dates of employment, and primary responsibilities of each person who is, or has ever been, an officer or executive of Servicios Funerarios, including without limitation (and regardless of whether they held the role of an officer or executive) all current and former roles held, and responsibilities performed, by Carlos Peña, Pablo Peña, and Octavio Trejo, as well as the first date on which Servicios Funerarios communicated with Carlos Peña, Pablo Peña, and Octavio Trejo regarding all current and former roles. For the avoidance of doubt, this Interrogatory includes the names, addresses, employment titles, and primary responsibilities of each person who is, or has ever been, an officer or executive of Gayosso subsequent to the January 2021 closing of the Gayosso Transaction.

**RESPONSE:**

Name	Position	Beginning Date	Termination Date	Responsibility
<b>CURRENT EMPLOYEES</b>				
Carlos Peña Vazquez	CEO	February 1, 2021	December 2, 2022	Define strategy and supervise day to day operations
Carlos Peña Vazquez	Executive President	December 2, 2022		Lead public relations, supervise execution of the agreements at the Board

Name	Position	Beginning Date	Termination Date	Responsibility
Juan Jesus Rodriguez Garcia	Deputy CEO	June 13, 2022	December 2, 2022	Lead operations, define new products, execute reorganization
Juan Jesus Rodriguez Garcia	CEO	December 2, 2022		Define strategy and supervise day to day operations
Midory Vazquez Nava	Administrative Director	March 8, 2021	February 28, 2023	Lead administration, client service, and financial controlling
Midory Vazquez Nava	CFO	February 28, 2023		Lead administration, accounting, fiscal, financial reporting and controlling
Ricardo Lemus Cazares	Operations Director	September 3, 1993		Lead operation in funeral homes, cemeteries, and mausoleums
Maria Isela Montenegro Aranda	CTO	February 15, 1995		Lead software developments, systems maintenance, networks, and IT applications
Gabriela Cruz Romero	Director de Gestion de Recursos	February 23, 2015		Lead collections, purchasing department and client service
Arnulfo Mejia Caballero	General Counsel	May 17, 2021		Lead legal department and security
Jorge Leonardo Palomera Ruiz	Commercial Director	January 30, 2023		Lead pre-need sales nationwide
Emilio de Leyva Escobar	Director of People, Projects and Processes	April 11, 2023		Lead human resources department, design and implement processes, certifications and projects
<b>FORMER EMPLOYEES</b>				
Everardo Garcia Moreno	Commercial Director	February 8, 2011	January 28, 2023	Lead pre-need sales nationwide

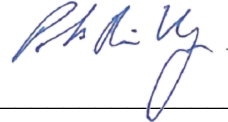
<b>Name</b>	<b>Position</b>	<b>Beginning Date</b>	<b>Termination Date</b>	<b>Responsibility</b>
Oscar Chavez Chavez	Planning and Marketing Director	August 5, 2013	December 31, 2021	Design commercial offer, marketing campaigns, and digital marketings
Luis Arturo Flores Cedeño	Director of Human Resources	May 16, 2012	May 19, 2023	Lead human resources department
Octavio Trejo Garcia	CFO	May 14, 2014	February 28, 2023	Lead accounting, financial reporting and fiscal. Before closing, also administration, legal, purchasing department, client service and financial controlling departments
Abigail Alejandro Sosa Hernandez	Director of Operations	January 5, 2015	June 15, 2021	Lead constructions, projects, maintenance, logistics, security and cemetery operations
Alejandro Kourchenko Torres	CTO	May 6, 2019	May 15, 2021	Lead software developments, systems maintenance, networks, and IT applications



**VERIFICATION**

I, Pablo Peña, hereby state that I am authorized to sign these Answers to Interrogatories on behalf of Servicios Funerarios GG, S.A. DE C.V., the subjects stated in the foregoing answers are not all within my personal knowledge, no one representative of Servicios Funerarios GG, S.A. DE C.V. has personal knowledge over all such subjects, I have assembled the answers by communicating with employees and/or agents of Servicios Funerarios GG, S.A. DE C.V., and I believe the answers and facts included herein are accurate and true to the best of my knowledge.

Date: June 5, 2023

A handwritten signature in blue ink, appearing to read 'Pablo Peña', is written above a horizontal line.

Pablo Peña

Dated: June 5, 2023

Respectfully submitted,

**BOIES SCHILLER FLEXNER LLP**

/s/ David Boies

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*Attorneys for Plaintiff Servicios  
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**CERTIFICATE OF SERVICE**

I, Michael Aleo, hereby certify that this document was sent by electronic mail to counsel for Advent International Corporation.

Date: June 5, 2023

/s/ Michael Aleo

Michael Aleo